

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-vs-

EDWARD MCLAUGHLIN  
and  
GARY WILLIAMS,

Defendants

NO. 3:CR-12- 179

**SUPERSEDING INDICTMENT**

**FILED  
SCRANTON**

AUG 28 2012

PER

DEPUTY CLERK

THE GRAND JURY CHARGES:

**Count 1**

From in or about February 2011, to in or about June 2012, in the Middle District of  
Pennsylvania, and elsewhere, the defendants,

**EDWARD MCLAUGHLIN  
and  
GARY WILLIAMS,**

did combine, confederate, and agree with each other, to commit the following offense against the  
United States, to wit: the use and causing another to use the mail and a facility of interstate  
commerce, that is a telephone, with intent that the murder of J. V. T. be committed in violation of  
the laws of the Commonwealth of Pennsylvania as consideration for the receipt of, and as  
consideration for a promise and agreement to pay, things of pecuniary value, to wit: money and a  
job paying a salary of approximately \$50,000, in violation of Title 18, United States Code,  
Section 1958.

**Manner and Means of the Conspiracy**

The manner and means by which the defendants sought to accomplish the objectives of

the conspiracy included, among others, the following:

1. The defendant McLaughlin solicited the defendant Williams to murder J.V.T.
2. The defendant McLaughlin mailed and shipped, or caused to be mailed and shipped, a firearm and ammunition to defendant Williams in the Middle District of Pennsylvania, for Williams to use to murder J.V.T.
3. The defendant McLaughlin wrote and mailed, or caused to be mailed, letters and made telephone calls to defendant Williams in the Middle District of Pennsylvania in which the defendant McLaughlin provided instructions to defendant Williams regarding the intended murder of J.V.T.
4. The defendant McLaughlin promised to provide money and employment with a salary of approximately \$50,000 per year to defendant Williams as consideration for Williams's murder of J.V.T.

#### Overt Acts

The defendants committed the following overt acts, among others, in furtherance of the conspiracy:

1. Between February 2011 and May 2012, the defendant McLaughlin solicited another person to kill J.V.T.
2. On or about March 5, 2012, the defendant McLaughlin shipped or caused to be shipped a Mauser rifle from Florida to defendant Williams in Scranton, Pennsylvania.
3. In or about January 2012 to in or about May 2012, the defendant McLaughlin wrote and mailed or caused to be mailed letters to defendant Williams urging Williams to murder J.V.T. and instructing Williams regarding how to commit the murder.
4. In or about January 2012 to in or about June 2012, the defendant McLaughlin contacted defendant Williams via telephone to solicit Williams to murder J.V.T.

5. In or about March 2012 to in or about June 2012, the defendant McLaughlin traveled to meet with defendant Williams in an effort to help Williams learn how to more accurately fire the rifle McLaughlin shipped to Williams.

All in violation of Title 18, United States Code, Section 1958.

THE GRAND JURY FURTHER CHARGES:

**Count 2**

From in or about February 2011, to in or about May 2012, in the Middle District of Pennsylvania, the defendant,

**EDWARD MCLAUGHLIN,**

with the intent that another person or persons engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade another person to engage in such conduct, that is, a violation of Title 18, United States Code, Section 1958 (use of the mail and interstate commerce facilities with the intent that a murder be committed in violation of the laws of any state).

In violation of Title 18, United States Code, Section 373.

THE GRAND JURY FURTHER CHARGES:

**Count 3**

In or about March 2012 to in or about June 2012, in Lackawanna County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**EDWARD MCLAUGHLIN  
and  
GARY WILLIAMS,**

aiding and abetting each other, and aided and abetted by each other, did knowingly use, possess and carry a firearm, namely a Mauser bolt action rifle, Model 48, 8mm caliber, serial number M57032, during and in relation to, and in furtherance of, crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to use the mail and a facility of interstate commerce to commit a murder for hire, a violation of 18 U.S.C. Section 1958.

All in violation of Title 18, United States Code, Section 924(c) and 2.

**A TRUE BILL:**

8/28/2012  
DATE

  
Peter J. Smith *TPS*  
PETER J. SMITH  
United States Attorney